

INTERNET  
FORM NLRB-501  
(2-08)UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER****DO NOT WRITE IN THIS SPACE**Case  
**01-CA-279573**Date Filed  
**7-7-21****INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer DCS SERVICE, INC. (D/B/A MASCO, D/B/A RELIANT JANITORIAL SERVICES, LLC)		b. Tel. No. (781) 933-9116
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) NINE LOWELL AVENUE MA WINCHESTER 01890	e. Employer Representative ANTHONY CLARK OWNER/PRESIDENT	g. e-Mail
		h. Number of workers employed 5
i. Type of Establishment (factory, mine, wholesaler, etc.) Services	j. Identify principal product or service COMMERCIAL CLEANING	
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 1 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		

**2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)**

--See additional page--

**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**

(b) (6), (b) (7)(C)

Title:

**4a. Address (Street and number, city, state, and ZIP code)**

(b) (6), (b) (7)(C)

4b. Tel. No.  
(b) (6), (b) (7)(C)4c. Cell No.  
(b) (6), (b) (7)(C)

4d. Fax No.

4e. e-Mail  
(b) (6), (b) (7)(C)**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)****6. DECLARATION**

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

By



(signature of representative or person making charge)

Pablo Justice At Work Carrasco  
Title: Staff Attorney  
(Print/type name and title or office, if any)Tel. No.  
(617) 599-3468Office, if any, Cell No.  
(617) 599-3468Fax No.  
(617) 995-0910e-Mail  
pcarrasco@jatwork.org

33 Harrison Ave., Suite 501

Address Boston MA 02111

07/07/2021 04:41:26 PM  
(date)**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)****PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

## Basis of the Charge

### 8(a)(1)

Within the previous six months, the Employer discharged an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employee discharged	Approximate date of discharge
(b) (6), (b) (7)(C)	(b) (6), (b) (7) /2021

### 8(a)(1)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, discussing wages, hours, or other terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	TERMINATION	(b) (6), (b) (7) /2021

### 8(a)(1)

Within the previous six months, the Employer disciplined or retaliated against an employee(s) because the employee(s) engaged in protected concerted activities by, inter alia, protesting terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Name of employee disciplined/retaliated against	Type of discipline/retaliation	Approximate date of discipline/retaliation
(b) (6), (b) (7)(C)	TERMINATION	(b) (6), (b) (7) 2021



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 1  
Thomas P. O'Neill Jr. Federal Building  
10 Causeway St, Room 601  
Boston, MA 02222-1001

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (617)565-6700  
Fax: (617)565-6725



Download  
NLRB  
Mobile App

Anthony Clark, Owner/President  
DCS Service, Inc. (d/b/a Masco, d/b/a Reliant Janitorial Services, LLC)  
Nine Lowell Avenue  
Winchester, MA 01890

Re: DCS SERVICE, INC. (D/B/A MASCO,  
D/B/A RELIANT JANITORIAL  
SERVICES, LLC)  
Case 01-CA-279573

Dear Mr. Clark:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner ESSIE ABLAVSKY whose telephone number is (202)273-3961. If this Board agent is not available, you may contact Supervisory Field Examiner DINA M. RAIMO PELHAM whose telephone number is (959)200-7377.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

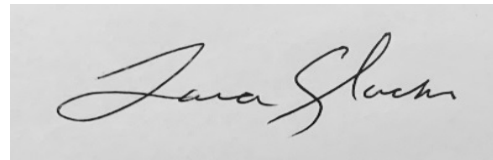
If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A rectangular box containing a handwritten signature in cursive script, which appears to read "Laura Sacks".

LAURA A. SACKS  
Acting Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire



## QUESTIONNAIRE ON COMMERCE INFORMATION

Please read carefully, answer all applicable items, and return to the NLRB Office. If additional space is required, please add a page and identify item number.

CASE NAME	CASE NUMBER 01-CA-279573
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## 1. EXACT LEGAL TITLE OF ENTITY (As filed with State and/or stated in legal documents forming entity)

## 2. TYPE OF ENTITY

☐ CORPORATION ☐ LLC ☐ LLP ☐ PARTNERSHIP ☐ SOLE PROPRIETORSHIP ☐ OTHER (Specify )

## 3. IF A CORPORATION or LLC

A. STATE OF INCORPORATION OR FORMATION	B. NAME, ADDRESS, AND RELATIONSHIP (e.g. parent, subsidiary) OF ALL RELATED ENTITIES
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## 4. IF AN LLC OR ANY TYPE OF PARTNERSHIP, FULL NAME AND ADDRESS OF ALL MEMBERS OR PARTNERS

## 5. IF A SOLE PROPRIETORSHIP, FULL NAME AND ADDRESS OF PROPRIETOR

## 6. BRIEFLY DESCRIBE THE NATURE OF YOUR OPERATIONS (Products handled or manufactured, or nature of services performed).

## 7A. PRINCIPAL LOCATION:

## 7B. BRANCH LOCATIONS:

## 8. NUMBER OF PEOPLE PRESENTLY EMPLOYED

A. TOTAL:

B. AT THE ADDRESS INVOLVED IN THIS MATTER:

9. DURING THE MOST RECENT (Check the appropriate box): ☐ CALENDAR ☐ 12 MONTHS or ☐ FISCAL YEAR (FY DATES \_\_\_\_\_)

	YES	NO
A. Did you provide services valued in excess of \$50,000 directly to customers outside your State? If no, indicate actual value. \$ _____		
B. If you answered no to 9A, did you provide services valued in excess of \$50,000 to customers in your State who purchased goods valued in excess of \$50,000 from directly outside your State? If no, indicate the value of any such services you provided. \$ _____		
C. If you answered no to 9A and 9B, did you provide services valued in excess of \$50,000 to public utilities, transit systems, newspapers, health care institutions, broadcasting stations, commercial buildings, educational institutions, or retail concerns? If less than \$50,000, indicate amount. \$ _____		
D. Did you sell goods valued in excess of \$50,000 directly to customers located outside your State? If less than \$50,000, indicate amount. \$ _____		
E. If you answered no to 9D, did you sell goods valued in excess of \$50,000 directly to customers located inside your State who purchased other goods valued in excess of \$50,000 from directly outside your State? If less than \$50,000, indicate amount. \$ _____		
F. Did you purchase and receive goods valued in excess of \$50,000 from directly outside your State? If less than \$50,000, indicate amount. \$ _____		
G. Did you purchase and receive goods valued in excess of \$50,000 from enterprises who received the goods directly from points outside your State? If less than \$50,000, indicate amount. \$ _____		
H. Gross Revenues from all sales or performance of services (Check the largest amount) <input type="checkbox"/> \$100,000 <input type="checkbox"/> \$250,000 <input type="checkbox"/> \$500,000 <input type="checkbox"/> \$1,000,000 or more If less than \$100,000, indicate amount.		
I. Did you begin operations within the last 12 months? If yes, specify date: _____		

## 10. ARE YOU A MEMBER OF AN ASSOCIATION OR OTHER EMPLOYER GROUP THAT ENGAGES IN COLLECTIVE BARGAINING?

☐ YES ☐ NO (If yes, name and address of association or group).

## 11. REPRESENTATIVE BEST QUALIFIED TO GIVE FURTHER INFORMATION ABOUT YOUR OPERATIONS

NAME	TITLE	E-MAIL ADDRESS	TEL. NUMBER
------	-------	----------------	-------------

## 12. AUTHORIZED REPRESENTATIVE COMPLETING THIS QUESTIONNAIRE

NAME AND TITLE (Type or Print)	SIGNATURE	E-MAIL ADDRESS	DATE
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## PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary. However, failure to supply the information may cause the NLRB to refuse to process any further a representation or unfair labor practice case, or may cause the NLRB to issue you a subpoena and seek enforcement of the subpoena in federal court.

**UNITED STATES OF AMERICA**  
**BEFORE THE NATIONAL LABOR RELATIONS BOARD**

**DCS SERVICE, INC. (D/B/A MASCO, D/B/A  
RELIANT JANITORIAL SERVICES, LLC)**

Charged Party

and

(b) (6), (b) (7)(C)

Charging Party

**Case 01-CA-279573**

**AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER**

I, the undersigned employee of the National Labor Relations Board, state under oath that on , I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

Anthony Clark, Owner/President  
DCS Service, Inc. (d/b/a Masco, d/b/a Reliant  
Janitorial Services, LLC)  
Nine Lowell Avenue  
Winchester, MA 01890

July 8, 2021

\_\_\_\_\_  
Date

Christine Sullivan, Designated Agent of  
NLRB

\_\_\_\_\_  
Name

*Christine Sullivan*

\_\_\_\_\_  
Signature



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 1  
Thomas P. O'Neill Jr. Federal Building  
10 Causeway St, Room 601  
Boston, MA 02222-1001

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (617)565-6700  
Fax: (617)565-6725



Download  
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July 8, 2021

(b) (6), (b) (7)(C)

Re: DCS SERVICE, INC. (D/B/A MASCO,  
D/B/A RELIANT JANITORIAL  
SERVICES, LLC)  
Case 01-CA-279573

Dear (b) (6), (b) (7)(C):

The charge that you filed in this case on July 08, 2021 has been docketed as case number 01-CA-279573. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Examiner ESSIE ABLAVSKY whose telephone number is (202)273-3961. If this Board agent is not available, you may contact Supervisory Field Examiner DINA M. RAIMO PELHAM whose telephone number is (959)200-7377.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.



**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

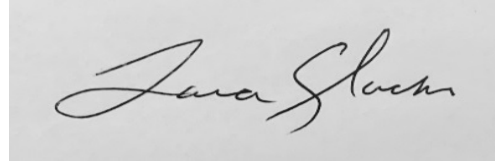
Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

DCS SERVICE, INC. (D/B/A MASCO,  
D/B/A RELIANT JANITORIAL  
SERVICES, LLC)  
Case 01-CA-279573

- 3 -

Very truly yours,

A handwritten signature in black ink, appearing to read "Laura Sacks", is centered within a light gray rectangular box.

LAURA A. SACKS  
Acting Regional Director

cc: Pablo Justice at Work Carrasco, Staff  
Attorney  
Justice at Work, Inc.  
33 Harrison Ave., Suite 501  
Boston, MA 02111

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD**AMENDED CHARGE AGAINST EMPLOYER****INSTRUCTIONS:**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
01-CA-279573	February 3, 2022

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer Reliant Cleaning Services		b. Tel. No. (781)933-9116
		c. Cell No.
d. Address (Street, city, state, and ZIP code) 21 Cummings Park, Woburn MA 01801	e. Employer Representative (b) (6), (b) (7)(C)	f. Fax No.
		g. e-mail
		h. Number of Workers Employed 5
i. Type of Establishment (factory, mine, wholesaler, etc.) Services	j. Identify Principal Product or Service Commercial Cleaning	

1. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

On about (b) (6), (b) (7)(C) 2021, the Employer, by its officers, agents and representatives, discharged employee (b) (6), (b) (7)(C) because (b) (6), (b) (7)(C) engaged in protected concerted activities by, inter alia, protesting terms and conditions of employment and in order to discourage employees from engaging in protected concerted activities.

Since about (b) (6), (b) (7)(C) 2021, the Employer, by its officers, agents and representatives, told employees that (b) (6), (b) (7)(C) was terminated because (b) (6), (b) (7)(C) engaged in protected concerted activity and told employees not to talk to others in the building.

3. Full name of party filing charge (if labor organization, give full name, including local name and number) (b) (6), (b) (7)(C)	
4a. Address (Street and number, city, state, and ZIP code) (b) (6), (b) (7)(C)	4b. Tel. No. (b) (6), (b) (7)(C)
	4c. Cell No. (b) (6), (b) (7)(C)
	4d. Fax No.
	4e. e-mail (b) (6), (b) (7)(C)
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p><i>Pablo Carrasco</i></p> <p>(signature of representative or person making charge)</p> <p>Address: 33 Harrison Ave., Suite 501 Boston MA 02111</p> </div> <div style="width: 45%;"> <p>Pablo Carrasco, Justice At Work, Staff Attorney</p> <p>(Print/type name and title or office, if any)</p> <p>Date: 2.1.2021</p> </div> </div>	
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Tel. No. (617) 599-3468</p> <p>Office, if any, Cell No. (857)308-9284</p> </div> <div style="width: 45%;"> <p>Fax No. (617) 995-0910</p> <p>e-mail pcarrasco@jatwork.org</p> </div> </div>	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001) PRIVACY ACT STATEMENT**

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UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 34  
450 Main St Ste 410  
Hartford, CT 06103-3078

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (860)240-3522  
Fax: (860)240-3564



Download  
NLRB  
Mobile App

February 4, 2022

Anthony Clark, Owner/President  
Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890

Re: RELIANT JANITORIAL SERVICES, LLC  
Case 01-CA-279573

Dear Mr. Clark:

Enclosed is a copy of the first amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Examiner Essie Ablavsky whose telephone number is (202)273-3961. If the agent is not available, you may contact Supervisory Field Examiner Dina M. Raimo Pelham whose telephone number is (959)200-7377.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn



February 4, 2022

statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlr.gov](http://www.nlr.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

Laura A. Sacks  
Regional Director

A handwritten signature in black ink that reads "Michael C. Cass". The signature is written in a cursive, flowing style.

By:

Michael C. Cass  
Officer in Charge

Enclosure: Copy of first amended charge

**UNITED STATES OF AMERICA**  
**BEFORE THE NATIONAL LABOR RELATIONS BOARD**

**RELIANT JANITORIAL SERVICES, LLC**

and

(b) (6), (b) (7)(C)

**Case 01-CA-279573**

**AFFIDAVIT OF SERVICE OF FIRST AMENDED CHARGE AGAINST EMPLOYER**

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on February 4, 2022, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

Anthony Clark, Owner/President  
Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890

February 4, 2022

Date

Elizabeth C. Person, Designated Agent of NLRB

Name

*Elizabeth C. Person*

Signature



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 34  
450 Main St Ste 410  
Hartford, CT 06103-3078

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (860)240-3522  
Fax: (860)240-3564



Download  
NLRB  
Mobile App

February 4, 2022

(b) (6), (b) (7)(C)

Re: RELIANT JANITORIAL SERVICES, LLC  
Case 01-CA-279573

Dear (b) (6), (b) (7)(C)

We have docketed the first amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Examiner Essie Ablavsky whose telephone number is (202)273-3961. If the agent is not available, you may contact Supervisory Field Examiner Dina M. Raimo Pelham whose telephone number is (959)200-7377.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn

February 4, 2022

statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlr.gov](http://www.nlr.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

Laura A. Sacks  
Regional Director



By:

Michael C. Cass  
Officer in Charge

cc: Pablo Carrasco, Staff Attorney  
Justice at Work, Inc.  
33 Harrison Ave., Suite 501  
Boston, MA 02111



**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION ONE**

RELIANT JANITORIAL SERVICES, LLC

and

(b) (6), (b) (7)(C), AN INDIVIDUAL

Case 01-CA-279573

**COMPLAINT AND NOTICE OF HEARING**

This Complaint and Notice of Hearing is based on a charge filed by (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) an Individual. It is issued pursuant to Section 10(b) of the National Labor Relations Act, 29 U.S.C. § 151 et seq. (the Act) and Section 102.15 of the Board's Rules and Regulations and alleges that Reliant Janitorial Services, LLC (Respondent) violated the Act, as described below.

1. (a) The charge in this proceeding was filed by (b) (6), (b) (7)(C) on July 8, 2021, and a copy was served by U.S. mail on Respondent on July 8, 2021.

(b) The amended charge in this proceeding was filed by (b) (6), (b) (7)(C) on February 3, 2022, and a copy was served by U.S. mail on Respondent on February 4, 2022.

2. At all material times, Respondent, a Massachusetts corporation, has been providing janitorial services at various facilities throughout Massachusetts, including 2 Heritage Drive in Quincy, Massachusetts (its Quincy facility).

3. Annually, Respondent, in conducting its operations described above in paragraph 2, purchases and receives at its Quincy facility goods valued in excess of \$50,000 directly from points outside the Commonwealth of Massachusetts.

4. At all material times, Respondent has been engaged in commerce within the meaning of Section 2(2), (6) and (7) of the Act.

5. At all material times, the following individuals held the positions set forth opposite their respective names and have been supervisors of Respondent within the meaning of Section 2(11) of the Act, and agents of Respondent within the meaning of Section 2(13) of the Act:

**(b) (6), (b) (7)(C)**

6. Beginning in about Fall 2020 and continuing into January 2021, Respondent's employee, (b) (6), (b) (7)(C) engaged in concerted activities with other employees for the purposes of mutual aid and protection, by discussing their terms and conditions of employment with tenants at Respondent's Quincy facility.

7. About (b) (6), (b) (7)(C), 2021, Respondent laid off (b) (6), (b) (7)(C)

8. Respondent engaged in the conduct described above in paragraph 7 because (b) (6), (b) (7)(C) engaged in the conduct described above in paragraph 6, and to discourage employees from engaging in these or other concerted activities.

9. About (b) (6), (b) (7)(C) 2021, Respondent, by (b) (6), (b) (7)(C) at its Quincy facility:

(a) Told employees that (b) (6), (b) (7)(C) was laid off because (b) (6), (b) (7)(C) engaged in protected concerted activities; and

(b) Prohibited employees from speaking with tenants at the Quincy facility.

10. By the conduct described above in paragraphs 7, 8, and 9, Respondent has been interfering with, restraining, and coercing its employees in the exercise of the rights guaranteed in Section 7 of the Act in violation of Section 8(a)(1) of the Act.

11. The unfair labor practices of Respondent described above affect commerce within the meaning of Section 2(6) and (7) of the Act.

### **ANSWER REQUIREMENT**

Respondent is notified that, pursuant to Sections 102.20 and 102.21 of the Board's Rules and Regulations, it must file an answer to the complaint. The answer must be **received by this office on or before February 22, 2022.** Respondent must serve a copy of the answer on each of the other parties.

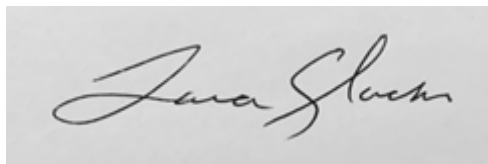
The answer must be filed electronically through the Agency's website. To file electronically, go to [www.nlr.gov](http://www.nlr.gov), click on E-File Documents, enter the NLRB Case Number, and follow the detailed instructions. The responsibility for the receipt and usability of the answer rests exclusively upon the sender. Unless notification on the Agency's website informs users that the Agency's E-Filing system is officially determined to be in technical failure because it is unable to receive documents for a continuous period of more than 2 hours after 12:00 noon (Eastern Time) on the due date for filing, a failure to timely file the answer will not be excused on the basis that the transmission could not be accomplished because the Agency's website was off-line or

unavailable for some other reason. The Board's Rules and Regulations require that an answer be signed by counsel or non-attorney representative for represented parties or by the party if not represented. See § 102.21. If the answer is a pdf document containing the required signature, no paper copies of the answer need to be transmitted to the Regional Office. However, if the answer to a complaint is not a pdf file containing the required signature, then the E-filing rules require that such answer containing the required signature continue to be submitted to the Regional Office by traditional means within three (3) business days after the date of electronic filing. Service of the answer on each of the other parties must still be accomplished by means allowed under the Board's Rules and Regulations. The answer may not be filed by facsimile transmission. If no answer is filed, or if an answer is filed untimely, the Board may find, pursuant to a Motion for Default Judgment, that the allegations in the complaint are true.

#### **NOTICE OF HEARING**

**PLEASE TAKE NOTICE THAT on Tuesday, April 26, 2022, at 10:00 a.m. at the Thomas P. O'Neill Federal Building, 10 Causeway Street, Suite 601, Boston, Massachusetts** and on consecutive days thereafter until concluded, a hearing will be conducted **virtually, on a platform (such as Zoom, Skype, WebEx, etc.),** before an administrative law judge of the National Labor Relations Board. **Details related to the virtual hearing will be provided at a later date.** At the hearing, Respondent and any other party to this proceeding has the right to appear and present testimony regarding the allegations in this consolidated complaint. The procedures to be followed at the hearing are described in the attached Form NLRB-4668. The procedure to request a postponement of the hearing is described in the attached Form NLRB-4338.

Dated: February 8, 2022

A rectangular box containing a handwritten signature in cursive script, which appears to read "Laura Sacks".

---

Laura A. Sacks, Regional Director  
Region One  
National Labor Relations Board

Attachments

UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD  
**NOTICE**

Case: 01-CA-279573

The issuance of the notice of formal hearing in this case does not mean that the matter cannot be disposed of by agreement of the parties. On the contrary, it is the policy of this office to encourage voluntary adjustments. The examiner or attorney assigned to the case will be pleased to receive and to act promptly upon your suggestions or comments to this end.

An agreement between the parties, approved by the Regional Director, would serve to cancel the hearing. However, unless otherwise specifically ordered, the hearing will be held at the date, hour, and place indicated. Postponements ***will not be granted*** unless good and sufficient grounds are shown ***and*** the following requirements are met:

- (1) The request must be in writing. An original and two copies must be filed with the Regional Director when appropriate under 29 CFR 102.16(a) or with the Division of Judges when appropriate under 29 CFR 102.16(b).
- (2) Grounds must be set forth in ***detail***;
- (3) Alternative dates for any rescheduled hearing must be given;
- (4) The positions of all other parties must be ascertained in advance by the requesting party and set forth in the request; and
- (5) Copies must be simultaneously served on all other parties (listed below), and that fact must be noted on the request.

Except under the most extreme conditions, no request for postponement will be granted during the three days immediately preceding the date of hearing.

**(b) (6), (b) (7)(C)**  
Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890  
Email: **(b) (6), (b) (7)(C)**@dcsserviceinc.com

Thomas C. LaPorte, Esq.  
Cossingham Law Office, P.C.  
30 Massachusetts Avenue, Suite 404  
North Andover, MA 01845  
Email: tlaporte@cossinghamlaw.com

**(b) (6), (b) (7)(C)**  
**(b) (6), (b) (7)(C)**  
Email: **(b) (6), (b) (7)(C)**

Pablo Carrasco, Staff Attorney  
Justice at Work, Inc.  
33 Harrison Ave., Suite 501  
Boston, MA 02111  
Email: pcarrasco@jatwork.org



## Procedures in NLRB Unfair Labor Practice Hearings

The attached complaint has scheduled a hearing that will be conducted by an administrative law judge (ALJ) of the National Labor Relations Board who will be an independent, impartial finder of facts and applicable law. **You may be represented at this hearing by an attorney or other representative.** If you are not currently represented by an attorney, and wish to have one represent you at the hearing, you should make such arrangements as soon as possible. A more complete description of the hearing process and the ALJ's role may be found at Sections 102.34, 102.35, and 102.45 of the Board's Rules and Regulations. The Board's Rules and regulations are available at the following link: [www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules\\_and\\_regs\\_part\\_102.pdf](http://www.nlr.gov/sites/default/files/attachments/basic-page/node-1717/rules_and_regs_part_102.pdf).

The NLRB allows you to file certain documents electronically and you are encouraged to do so because it ensures that your government resources are used efficiently. To e-file go to the NLRB's website at [www.nlr.gov](http://www.nlr.gov), click on "e-file documents," enter the 10-digit case number on the complaint (the first number if there is more than one), and follow the prompts. You will receive a confirmation number and an e-mail notification that the documents were successfully filed.

**Although this matter is set for trial, this does not mean that this matter cannot be resolved through a settlement agreement.** The NLRB recognizes that adjustments or settlements consistent with the policies of the National Labor Relations Act reduce government expenditures and promote amity in labor relations and encourages the parties to engage in settlement efforts.

### I. BEFORE THE HEARING

The rules pertaining to the Board's pre-hearing procedures, including rules concerning filing an answer, requesting a postponement, filing other motions, and obtaining subpoenas to compel the attendance of witnesses and production of documents from other parties, may be found at Sections 102.20 through 102.32 of the Board's Rules and Regulations. In addition, you should be aware of the following:

- **Special Needs:** If you or any of the witnesses you wish to have testify at the hearing have special needs and require auxiliary aids to participate in the hearing, you should notify the Regional Director as soon as possible and request the necessary assistance. Assistance will be provided to persons who have handicaps falling within the provisions of Section 504 of the Rehabilitation Act of 1973, as amended, and 29 C.F.R. 100.603.
- **Pre-hearing Conference:** One or more weeks before the hearing, the ALJ may conduct a telephonic prehearing conference with the parties. During the conference, the ALJ will explore whether the case may be settled, discuss the issues to be litigated and any logistical issues related to the hearing, and attempt to resolve or narrow outstanding issues, such as disputes relating to subpoenaed witnesses and documents. This conference is usually not recorded, but during the hearing the ALJ or the parties sometimes refer to discussions at the pre-hearing conference. You do not have to wait until the prehearing conference to meet with the other parties to discuss settling this case or any other issues.

### II. DURING THE HEARING

The rules pertaining to the Board's hearing procedures are found at Sections 102.34 through 102.43 of the Board's Rules and Regulations. Please note in particular the following:

- **Witnesses and Evidence:** At the hearing, you will have the right to call, examine, and cross-examine witnesses and to introduce into the record documents and other evidence.
- **Exhibits:** Each exhibit offered in evidence must be provided in duplicate to the court reporter and a copy of each of each exhibit should be supplied to the ALJ and each party when the exhibit is offered

**in evidence.** If a copy of any exhibit is not available when the original is received, it will be the responsibility of the party offering such exhibit to submit the copy to the ALJ before the close of hearing. If a copy is not submitted, and the filing has not been waived by the ALJ, any ruling receiving the exhibit may be rescinded and the exhibit rejected.

- **Transcripts:** An official court reporter will make the only official transcript of the proceedings, and all citations in briefs and arguments must refer to the official record. The Board will not certify any transcript other than the official transcript for use in any court litigation. Proposed corrections of the transcript should be submitted, either by way of stipulation or motion, to the ALJ for approval. Everything said at the hearing while the hearing is in session will be recorded by the official reporter unless the ALJ specifically directs off-the-record discussion. If any party wishes to make off-the-record statements, a request to go off the record should be directed to the ALJ.
- **Oral Argument:** You are entitled, on request, to a reasonable period of time at the close of the hearing for oral argument, which shall be included in the transcript of the hearing. Alternatively, the ALJ may ask for oral argument if, at the close of the hearing, if it is believed that such argument would be beneficial to the understanding of the contentions of the parties and the factual issues involved.
- **Date for Filing Post-Hearing Brief:** Before the hearing closes, you may request to file a written brief or proposed findings and conclusions, or both, with the ALJ. The ALJ has the discretion to grant this request and to will set a deadline for filing, up to 35 days.

### III. AFTER THE HEARING

The Rules pertaining to filing post-hearing briefs and the procedures after the ALJ issues a decision are found at Sections 102.42 through 102.48 of the Board's Rules and Regulations. Please note in particular the following:

- **Extension of Time for Filing Brief with the ALJ:** If you need an extension of time to file a post-hearing brief, you must follow Section 102.42 of the Board's Rules and Regulations, which requires you to file a request with the appropriate chief or associate chief administrative law judge, depending on where the trial occurred. You must immediately serve a copy of any request for an extension of time on all other parties and furnish proof of that service with your request. You are encouraged to seek the agreement of the other parties and state their positions in your request.
- **ALJ's Decision:** In due course, the ALJ will prepare and file with the Board a decision in this matter. Upon receipt of this decision, the Board will enter an order transferring the case to the Board and specifying when exceptions are due to the ALJ's decision. The Board will serve copies of that order and the ALJ's decision on all parties.
- **Exceptions to the ALJ's Decision:** The procedure to be followed with respect to appealing all or any part of the ALJ's decision (by filing exceptions with the Board), submitting briefs, requests for oral argument before the Board, and related matters is set forth in the Board's Rules and Regulations, particularly in Section 102.46 and following sections. A summary of the more pertinent of these provisions will be provided to the parties with the order transferring the matter to the Board.

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION ONE**

RELIANT JANITORIAL SERVICES, LLC

And

Case 01-CA-279573

**(b) (6), (b) (7)(C)**, AN INDIVIDUAL

**ANSWER OF RELIANT JANITORIAL SERVICES, LLC**

1(a). Respondent, Reliant Janitorial Services, LLC, (hereinafter “Respondent”), deny the allegations in Paragraph 1(a) of the Charge, and by way of further answer states the Charge was inappropriately brought against a separate entity separately organized under the law of the Commonwealth of Massachusetts.

1(b). Respondent is without knowledge of the allegations of paragraph 1(b) and on that basis denies same.

2. Respondent is without knowledge of “all material times” as set forth, yet undefined, in the allegation in paragraph 2, and on that basis denies same. Further, Respondent denies that it is a Massachusetts corporation. Respondent admits it provides janitorial services as alleged at 2 Heritage Drive, Quincy, Massachusetts.

3. Respondent reiterates its admission that it provided janitorial services at 2 Heritage Drive, Quincy, Massachusetts as originally set forth above in Paragraph 2, hereinabove. Further, Respondent is without sufficient knowledge of the remaining allegations set forth in Paragraph 3, and on that basis denies same.

4. Respondent is without knowledge of “all material times” as set forth, yet undefined, in the allegation in paragraph 4. Further, whether Respondent has been engaged in commerce within the meaning of the cited Subsections of the National Labor Relations Act, (the NLRA”), calls for a legal conclusion from a lay Respondent, who therefore is without knowledge of said allegation in Paragraph 4, and on that basis denies same.

5. Respondent is without knowledge of “all material times” as set forth, yet undefined, in the allegation in paragraph 5. Further, the allegations as to whether identified persons in paragraph 5 are supervisors within the meaning of subsection 2(11) of the NLRA and/or as to whether said identified individuals are agents of the Respondent within the meaning of Subsection 2(13) of the NLRA, each, respectively, call for a legal conclusion from a lay Respondent, who therefore is without knowledge of those said allegations in Paragraph 5, and on those bases deny same. By way of further answer, Respondent admits that one of **(b) (6), (b) (7)(C)** titles is **(b) (6), (b) (7)(C)**. Respondent denies that remaining allegations of Paragraph 5.

6. Respondent was without knowledge of the nature of any such activities or of any such other employees or discussions with any tenants referenced in Paragraph 6, during the time period identified in Paragraph 6, and on that basis, as well as categorically, denies the allegations set forth in Paragraph 6.
7. Respondent admits that it laid off (b) (6), (b) (7)(C) solely due to Pandemic-related closings of various of its clients' buildings and/or facilities and further due Work from Home Emergency Orders and recommendations of the Center for Disease Control, causing said clients to cut costs for the time being, such as cleaning and related janitorial services of unoccupied or only partially occupied work premises; that the same was related to (b) (6), (b) (7)(C), who indicated (b) (6), (b) (7)(C) understanding of the same, and that such layoff was done in accordance with Respondent's uniformly- enforced procedure based on seniority. By way of further answer Respondent states that (b) (6), (b) (7)(C) refused to accept reinstatement after client demand began to return, of suitable alternative re-employment with no material diminishment of (b) (6), (b) (7)(C) previous working conditions.
8. Respondent denies the allegations set forth in Paragraph 8.
9. Respondent denies the allegations set forth in Paragraph 9.
10. Respondent denies the allegations set forth in Paragraph 10.
11. Respondent calls upon Complaining and Charging Partie(s) to prove the allegations denied hereinabove in accord with the applicable Burdens of Proof.

February 22, 2022

RELIANT JANITORIAL SERVICES, LLC

/s/ Thomas C. LaPorte  
Thomas C. LaPorte, Esquire  
BBO: 634194  
Cossingham Law Office, PC  
30 Mass. Ave., Suite 404  
North Andover, MA 01845  
Tel No.: 978-685-5686  
Email: [Tlaporte@cossinghamlaw.com](mailto:Tlaporte@cossinghamlaw.com)



CERTIFICATE OF SERVICE

I, Thomas C. LaPorte, do hereby certify that I have served copies, pursuant to NLRB Rule 102.21, of the foregoing Answer to Amended Charge, via electronic mail upon the following:

(b) (6), (b) (7)(C)

Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890

(b) (6), (b) (7)(C)

Pablo Carrasco, Staff Attorney  
Justice at Work, Inc.  
33 Harrison Ave., Ste 501  
Boston, MA 02111  
[pcarrasco@jatwork.org](mailto:pcarrasco@jatwork.org)

Date: February 22, 2022

/s/Thomas C. LaPorte

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 01**

**RELIANT JANITORIAL SERVICES, LLC**

**and**

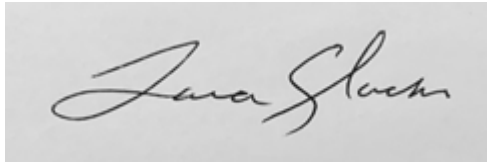
**(b) (6), (b) (7)(C), an Individual**

**Case 01-CA-279573**

**ORDER RESCHEDULING HEARING**

**IT IS HEREBY ORDERED** that the hearing in the above-entitled matter is rescheduled from April 26, 2022 to **Tuesday, May 10, 2022** at the Thomas P. O'Neill Jr. Federal Building, 10 Causeway Street, Room 601, Boston, Massachusetts by a **Virtual Hearing, on a platform (such as Zoom, Skype, WebEx, etc.),** before an administrative law judge of the National Labor Relations Board. **Details related to the virtual hearing will be provided at a later date.** The hearing will continue on consecutive days until concluded.

Dated: March 3, 2022



---

Laura A. Sacks, Regional Director  
National Labor Relations Board  
Region 01

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 01**

**RELIANT JANITORIAL SERVICES, LLC**

**and**

**(b) (6), (b) (7)(C), an Individual**

**Case 01-CA-279573**

**AFFIDAVIT OF SERVICE OF: ORDER RESCHEDULING HEARING**

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on **March 3, 2022**, I served the above-entitled document(s) by **electronic mail** upon the following persons, addressed to them at the following addresses:

**(b) (6), (b) (7)(C)**  
Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890  
Email: **(b) (6), (b) (7)(C)**@dcsserviceinc.com

Thomas C. LaPorte, Esq.  
Cossingham Law Office, P.C.  
30 Massachusetts Avenue, Ste 404  
North Andover, MA 01845  
Email: tlaporte@cossinghamlaw.com

**(b) (6), (b) (7)(C)**  
**(b) (6), (b) (7)(C)**  
Email: **(b) (6), (b) (7)(C)**

Pablo Carrasco, Staff Attorney  
Justice at Work, Inc.  
33 Harrison Ave., Suite 501  
Boston, MA 02111  
Email: pcarrasco@jatwork.org

March 3, 2022  
\_\_\_\_\_  
Date

Elizabeth C. Person, Designated Agent of NLRB  
\_\_\_\_\_  
Name

*Elizabeth C. Person*

\_\_\_\_\_  
Signature

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 01**

**RELIANT JANITORIAL SERVICES, LLC**

**and**

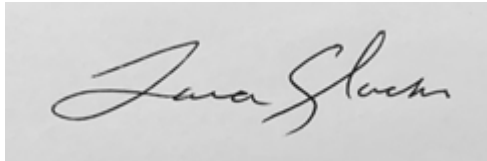
**(b) (6), (b) (7)(C), an Individual**

**Case 01-CA-279573**

**ORDER FURTHER RESCHEDULING HEARING**

**IT IS HEREBY ORDERED** that the hearing in the above-entitled matter is further rescheduled from May 10, 2022 to **Tuesday, May 24, 2022** at 11 am at the Thomas P. O'Neill Jr. Federal Building, 10 Causeway Street, Suite 1002, Boston, Massachusetts. The hearing will continue on consecutive days until concluded.

Dated: March 4, 2022

A handwritten signature in black ink, appearing to read "Laura Sacks", is centered within a light gray rectangular box.

---

Laura A. Sacks, Regional Director  
National Labor Relations Board  
Region 01

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 01**

**RELIANT JANITORIAL SERVICES, LLC**

**and**

**(b) (6), (b) (7)(C), an Individual**

**Case 01-CA-279573**

**AFFIDAVIT OF SERVICE OF: ORDER FURTHER RESCHEDULING HEARING**

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on **March 4, 2022**, I served the above-entitled document(s) by **electronic mail** upon the following persons, addressed to them at the following addresses:

**(b) (6), (b) (7)(C)**

Reliant Janitorial Services, LLC

Nine Lowell Avenue

Winchester, MA 01890

Email: **(b) (6), (b) (7)(C)**@dcsserviceinc.com

Thomas C. LaPorte, Esq.

Cossingham Law Office, P.C.

30 Massachusetts Avenue, Ste 404

North Andover, MA 01845

Email: tlaporte@cossinghamlaw.com

**(b) (6), (b) (7)(C)**

Email: **(b) (6), (b) (7)(C)**

Pablo Carrasco, Staff Attorney

Justice at Work, Inc.

33 Harrison Ave., Suite 501

Boston, MA 02111

Email: pcarrasco@jatwork.org

March 4, 2022

Date

Elizabeth C. Person, Designated Agent of NLRB

Name

*Elizabeth C. Person*

Signature

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION ONE**

RELIANT JANITORIAL SERVICES, LLC

And

Case 01-CA-279573

**(b) (6), (b) (7)(C)** AN INDIVIDUAL

**AMENDED ANSWER OF RELIANT JANITORIAL SERVICES, LLC**

1(a). Respondent, Reliant Janitorial Services, LLC, (hereinafter “Respondent”), deny the allegations in Paragraph 1(a) of the Charge, and by way of further answer states the Charge was inappropriately brought against a separate entity separately organized under the law of the Commonwealth of Massachusetts.

1(b). Respondent denies that phone number alleged in paragraph 1(b) is the operative business phone number used by Respondent or its clients.

1(c). Respondent admits the allegations in paragraph 1(c).

1(d). Respondent admits the allegations in paragraph 1(d).

1(e). Respondent admits the allegations in paragraph 1(e).

1(f). There is no allegation in paragraph 1(f). To the extent an answer to same is required, Respondent denies the same.

1(g). There is no allegation in paragraph 1(g). To the extent an answer to same is required, Respondent denies the same.

1(h). Respondent denies the allegation in paragraph 1(h).

1(j). Respondent admits the allegations in paragraph 1(j).

1(l). Respondent denies all of the allegations, which are in the conjunctive, in paragraph 1(l). By way of further answer, Respondent states that it laid off **(b) (6), (b) (7)(C)** solely due to Pandemic-related closings of various of its clients’ buildings and/or facilities and further due to “Work from Home” advisories and recommendations by the Center for Disease Control, and related Orders, causing said clients to cut costs for the then time-being, such as cleaning and related janitorial services of unoccupied or only partially occupied work premises; that the same was related to **(b) (6), (b) (7)(C)**, who admitted **(b) (6), (b) (7)(C)** was laid off after falsely claiming **(b) (6), (b) (7)(C)** was “fired”, and that such layoff was done in accordance with Respondent’s uniformly-enforced, neutral procedure based on seniority, and on no illegal discriminatory basis. By way of further answer Respondent states that **(b) (6), (b) (7)(C)** refused to accept reinstatement after client demand began to return, of suitable alternative re-employment with no material diminishment of **(b) (6), (b) (7)(C)** previous



working conditions. As a result of unprotected slanderous and defamatory statements which reference allegations set forth in this Amended Charge, which were published, and/or published and republished, Respondent's business reputation as well as reputation for operating ethically and within the law has been unfairly sullied, and further that it has suffered significant monetary and other damages, which continue, as a result of same. Respondent calls upon Complaining and Charging Partie(s) to prove the allegations denied in this Amended Answer to Amended Charge in accord with the applicable Burdens of Proof.

2. Respondent denies all of the allegations in paragraph 2. By way of further answer, Respondent states that it laid off (b) (6), (b) (7)(C) solely due to Pandemic-related closings of various of its clients' buildings and/or facilities and further due to "Work from Home" advisories and recommendations by the Center for Disease Control, and related Orders, causing said clients to cut costs for the then time-being, such as cleaning and related janitorial services of unoccupied or only partially occupied work premises; that the same was related to (b) (6), (b) (7)(C), who admitted (b) (6), (b) (7)(C) was laid off after falsely claiming (b) (6), (b) (7)(C) was "fired", and that such layoff was done in accordance with Respondent's uniformly-enforced, neutral procedure based on seniority, and on no illegal discriminatory basis. By way of further answer Respondent states that (b) (6), (b) (7)(C) refused to accept reinstatement after client demand began to return, of suitable alternative re-employment with no material diminishment of (b) (6), (b) (7)(C) previous working conditions. As a result of unprotected slanderous and defamatory statements which reference allegations set forth in this Amended Charge, which were published, and/or published and republished, Respondent's business reputation as well as reputation for operating ethically and within the law has been unfairly sullied, and further that it has suffered significant monetary and other damages, which continue, as a result of same. Respondent calls upon Complaining and Charging Partie(s) to prove the allegations denied this Amended Answer to Amended Charge in accord with the applicable Burdens of Proof.

3 Respondent admits a "(b) (6), (b) (7)(C)" appears to have filed the Amended Charge against Respondent. Respondent has insufficient knowledge as to whether (b) (6), (b) (7)(C) is the aforesaid (b) (6), (b) (7)(C) full name, and on that basis denies the allegation in paragraph 3.

4(a) Respondents were provided a different address from (b) (6), (b) (7)(C), has no knowledge otherwise, and on those bases denies the allegation in paragraph 4(a).

4(b) Respondent was provided the same phone number by (b) (6), (b) (7)(C) as (b) (6), (b) (7)(C) and on that basis admits to the allegation in 4(b).

4(c) Respondent was provided the same phone number by (b) (6), (b) (7)(C) as (b) (6), (b) (7)(C) and on that basis admits to the allegation in 4(c).

4(d) There is no allegation in paragraph 4(d). To the extent an answer to same is required, Respondent denies the same.

4(e) Respondent was provided the same email address by (b) (6), (b) (7)(C) as (b) (6), (b) (7)(C) and on that basis admits to the allegation in 4(e).

5. There is no allegation in paragraph 5. To the extent an answer to same is required, Respondent denies the same.

6. There is no allegation in paragraph 6. To the extent an answer to same is required, Respondent denies the same.

March 24, 2022

RELIANT JANITORIAL SERVICES, LLC

/s/ Thomas C. LaPorte  
Thomas C. LaPorte, Esquire  
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CERTIFICATE OF SERVICE

I, Thomas C. LaPorte, do hereby certify that I have served copies, pursuant to NLRB Rule 102.21, of the foregoing Answer to Amended Charge, via electronic mail upon the following:

(b) (6), (b) (7)(C)

Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890

(b) (6), (b) (7)(C)

Pablo Carrasco, Staff Attorney  
Justice at Work, Inc.  
33 Harrison Ave., Ste 501  
Boston, MA 02111  
[pcarrasco@jatwork.org](mailto:pcarrasco@jatwork.org)

Date: February 21, 2022

/s/Thomas C. LaPorte

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION ONE**

RELIANT JANITORIAL SERVICES, LLC

And

Case 01-CA-279573

**(b) (6), (b) (7)(C)**, AN INDIVIDUAL

**SECOND AMENDED ANSWER OF RELIANT JANITORIAL SERVICES, LLC  
(TO COMPLAINT FILED FEBRUARY 8, 2022, per NLRB Rules and Regulations 102.23)**

- 1a. Respondent, Reliant Janitorial Services, LLC, (hereinafter “Respondent”), deny the allegations in Paragraph 1 of the Complaint, and by way of further answer states the Charge was inappropriately brought against a separate entity separately organized under the law of the Commonwealth of Massachusetts.
- 1b. Respondent admits the allegations in Paragraph 1b.
2. Respondent admits the allegations in paragraph 2 insofar as it provided janitorial services within Massachusetts, including at 2 Heritage Drive, Quincy, MA, but denies that 2 Heritage Drive in Quincy, MA is “its facility”, as alleged in the Complaint, or that it has any ownership interest in that property and the facility located thereon.
3. Respondent denies the allegations in Paragraph 3, as originally set forth in signed Answers set forth in the Questionnaire on Commerce Information, signed by Respondent’s authorized signatory on July 15, 2021, and recently reviewed By Respondent’s Counsel. Respondent is without knowledge of the “all material times” alleged in the Complaint but which is not defined by any time period or otherwise, and that this portion of the answer is not made with any intent, particularly willful intent, to defeat the purpose of NLRB 102.21; and should the quoted terms be defined, Respondent shall reassess any appropriate amendment to this portion of the allegation in Paragraph 3.
4. Respondent is without knowledge of the “all material times” alleged in the Complaint but which is not defined by any time period or otherwise, and that this portion of the answer is not made with any intent, particularly willful intent, to defeat the purpose of NLRB Rules and Regulations, Section 102.21; and should the quoted terms be defined, Respondent shall reassess any appropriate amendment to this portion of the allegation in Paragraph 4. By way of further answer, the allegations in Paragraph 4 regarding Respondent has been engaged during said “all material times” does not simply allege a fact, to which a specific admission or denial can be provided pursuant to NLRB Rules and Regulations, Section 102.20, but rather asks for the Respondent, comprised of non-attorney, lay persons, to make a legal determination regarding whether activity it has been alleged to engaged in constitute commerce within the meaning of

different subsections, [2(2), (6) and (7)], of the National Labor Relations Act statute, and therefore respondent has insufficient, including and specifically legal knowledge, to specifically admit or deny this portion of the allegations in Paragraph 4, and on that basis, therefore, denies same. By way of further answer, this portion of the answer is not made with any intent, particularly willful intent, to defeat the purpose of NLRB Rules and Regulations, Section 102.21.

5. Respondent is without knowledge of the “all material times” alleged in the Complaint but which is not defined by any time period or otherwise, and that this portion of the answer is not made with any intent, particularly willful intent, to defeat the purpose of NLRB Rules and Regulations, Section 102.21; and should the quoted terms be defined, Respondent shall reassess any appropriate amendment to this portion of the allegation in Paragraph 4. By way of further answer, Respondent admits that (b) (6), (b) (7)(C) was assigned the title of (b) (6), (b) (7)(C) of Respondent beginning (b) (6), (b) (7)(C), and that (b) (6), (b) (7)(C) was hired by Respondent on (b) (6), (b) (7)(C), and assigned the title of (b) (6), (b) (7)(C). By way of further answer, the allegations in Paragraph 4 regarding Respondent has been engaged during said “all material times” does not simply allege a fact, to which a specific admission or denial can be provided pursuant to NLRB Rules and Regulations, Section 102.20, but rather asks for the Respondent, comprised of non-attorney, lay persons, to make a legal determination regarding whether (b) (6), (b) (7)(C) and whether (b) (6), (b) (7)(C) are or constitute “supervisors” within the meaning of subsection 2(11) of the National Labor Relations Act statute, and whether (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) are “agents” within the meaning of subsection 2(13) of the National Labor Relations Act statute, therefore respondent has insufficient, including and specifically legal knowledge, to specifically admit or deny these portions of the allegations in Paragraph 5, and on that basis, therefore, denies same. By way of further answer, this portion of the answer is not made with any intent, particularly willful intent, to defeat the purpose of NLRB Rules and Regulations, Section 102.21. Respondent

6. Respondent is without knowledge of the allegations in Paragraph 6 regarding engaging in any concerted activities for the purposes of mutual aid and protection, or of any discussions by (b) (6), (b) (7)(C) or others regarding the same. Respondent denies it has any ownership interest in the “Quincy facility,” as defined in the Complaint.

7. Respondent admits the allegations in Paragraph 7 that it laid (b) (6), (b) (7)(C) off on (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) 2021. By way of further answer, Respondent states that it laid off (b) (6), (b) (7)(C) solely due to Pandemic-related closings of various of its clients’ buildings and/or facilities and further due to “Work from Home” advisories and recommendations by the Center for Disease Control, and related Orders, causing said clients to cut costs for the then time-being, such as cleaning and related janitorial services of unoccupied or only partially occupied work premises, thereby reducing the demand for said services; that the same was conveyed to (b) (6), (b) (7)(C), who admitted (b) (6), (b) (7)(C) was laid off after falsely claiming (b) (6), (b) (7)(C) was “fired”, and that such layoff was done in accordance with Respondent’s uniformly- enforced, neutral procedure based on seniority, and on no illegal discriminatory basis. By way of further answer Respondent states that (b) (6), (b) (7)(C) refused to accept reinstatement after client demand began to return, of suitable alternative re-employment with no material diminishment of (b) (6), (b) (7)(C) previous working conditions. As a result of

unprotected slanderous and defamatory statements which reference allegations set forth in this Amended Charge, which were published, and/or published and republished, Respondent's business reputation as well as reputation for operating ethically and within the law has been unfairly sullied, and further that it has suffered significant monetary and other damages, which continue, as a result of same. Respondent calls upon Complaining and Charging Parties to prove the allegations denied in this Second Amended Answer to the Complaint Charge in accord with the applicable Burdens of Proof.

8. Respondent denies all of the allegations in paragraph 8. By way of further answer, Respondent incorporates and restates its further Answer set forth above in paragraph 7, and fully incorporates the same in this Answer to the Allegations of Paragraph 8.

9. Respondent denies all of the allegations in Paragraph 9. By way of further answer, Respondent incorporates and restates its further Answer set forth above in paragraphs 7 and 8, and fully incorporates the same in this Answer to the Allegations of Paragraph 9.

10. Respondent denies all of the allegations in Paragraph 10 that it interfered with, restrained, or coerced any employees in the exercise of any of their rights guaranteed by law, or otherwise.

11. Respondent has insufficient, including and specifically legal knowledge, to specifically admit or deny these portions of the allegations in Paragraph 10, and on that basis, therefore, denies same.

May 3, 2022,

RELIANT JANITORIAL SERVICES, LLC

/s/ Thomas C. LaPorte  
Thomas C. LaPorte, Esquire  
BBO: 634194  
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P.O. Box 390  
573 Pine Street  
Manchester, NH 03104  
Tel No.: 603-303-9520  
Email: [laportelawgroup@gmail.com](mailto:laportelawgroup@gmail.com)



CERTIFICATE OF SERVICE

I, Thomas C. LaPorte, do hereby certify that I have served copies, pursuant to NLRB Rule 102.21, of the foregoing Second Amended Answer to Complaint, filed 2-8-2022, via the electronic filing system, and by separate electronic mail upon the following:

(b) (6), (b) (7)(C)

Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890

Miriam Hasbun, Esq.  
Counsel for the General Counsel  
National Labor Relations Board  
Region 1  
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Boston, MA 02222  
[Miriam.Hasbun@nrlrb.com](mailto:Miriam.Hasbun@nrlrb.com)

Emily G. Goldman, Esq.  
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[Emily.Goldman@nrlrb.com](mailto:Emily.Goldman@nrlrb.com)

Pablo Carrasco, Staff Attorney  
Justice at Work, Inc.  
Counsel for (b) (6), (b) (7)(C)  
33 Harrison Ave., Ste 501  
Boston, MA 02111  
[pcarrasco@jatwork.org](mailto:pcarrasco@jatwork.org)

Date: May 3, 2022

/s/Thomas C. LaPorte

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION ONE**

RELIANT JANITORIAL SERVICES, LLC

And

Case 01-CA-279573

**(b) (6), (b) (7)(C)**, AN INDIVIDUAL

**THIRD AMENDED ANSWER OF RELIANT JANITORIAL SERVICES, LLC  
(TO COMPLAINT FILED FEBRUARY 8, 2022, per NLRB Rules and Regulations 102.23,  
following Pre-Hearing Teleconference held May 5, 2022 @ 11 a.m. by Judge Charles Muhl)**

- 1a. Respondent, Reliant Janitorial Services, LLC, (hereinafter “Respondent”), deny the allegations in Paragraph 1 of the Complaint, and by way of further answer states the Charge was inappropriately brought against a separate entity separately organized under the law of the Commonwealth of Massachusetts.
- 1b. Respondent admits the allegations in Paragraph 1b.
2. Respondent admits the allegations in paragraph 2 insofar as it is a limited liability company organized in, and in good standing with the Commonwealth of Massachusetts and that it provided janitorial services within Massachusetts, including at 2 Heritage Drive, Quincy, MA, but denies that 2 Heritage Drive in Quincy, MA is “its facility”, as alleged in the Complaint, or that it has any ownership interest in that property and the facility located thereon.
3. Respondent denies the allegations in Paragraph 3, as originally set forth in signed Answers set forth in the Questionnaire on Commerce Information, signed by Respondent’s authorized signatory on July 15, 2021, and recently reviewed By Respondent’s Counsel.
4. Respondent admits that from January 1, 2021 to the present that it was engaged in commerce within the Meaning of the National Labor Relations Act Section 2(6) which defines “commerce”, that it has been an employer within the meaning of Section 2(2) of said act, which defines “employers”, and that it “affected commerce” as defined by Section 2(7) of that statute insofar as it was, during said time period, in commerce. Respondent denies that Sections 2(2) and 2(7) of said Act define “commerce”
5. Respondent admits that **(b) (6), (b) (7)(C)** from **(b) (6), (b) (7)(C)** to the present was a supervisor and agent of Respondent within the meaning of the National Labor Relations Act Sections 2(11) and 2(13), and that **(b) (6), (b) (7)(C)**, from **(b) (6), (b) (7)(C)** to the present, was an agent of the Respondent within the meaning of Section 2(13) of said Act, but denies **(b) (6), (b) (7)(C)** **(b) (6), (b) (7)(C)** was, during said time period, a supervisor within the meaning of Section 2(11) of said Act.

6. Respondent is without knowledge of the allegations in Paragraph 6 regarding engaging in any concerted activities for the purposes of mutual aid and protection, or of any discussions by (b) (6), (b) (7)(C) or others regarding the same. Respondent denies it has any ownership interest in the “Quincy facility,” as defined in the Complaint.

7. Respondent admits the allegations in Paragraph 7 that it laid (b) (6), (b) (7)(C) off on (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) 2021. By way of further answer, Respondent states that it laid off (b) (6), (b) (7)(C) solely due to Pandemic-related closings of various of its clients’ buildings and/or facilities and further due to “Work from Home” advisories and recommendations by the Center for Disease Control, and related Orders, causing said clients to cut costs for the then time-being, such as cleaning and related janitorial services of unoccupied or only partially occupied work premises, thereby reducing the demand for said services; that the same was conveyed to (b) (6), (b) (7)(C), who admitted (b) (6), (b) (7)(C) was laid off after falsely claiming (b) (6), (b) (7)(C) was “fired”, and that such layoff was done in accordance with Respondent’s uniformly- enforced, neutral procedure based on seniority, and on no illegal discriminatory basis. By way of further answer Respondent states that (b) (6), (b) (7)(C) refused to accept reinstatement after client demand began to return, of suitable alternative re-employment with no material diminishment of (b) (6), (b) (7)(C) previous working conditions. As a result of unprotected slanderous and defamatory statements which reference allegations set forth in this Amended Charge, which were published, and/or published and republished, Respondent’s business reputation as well as reputation for operating ethically and within the law has been unfairly sullied, and further that it has suffered significant monetary and other damages, which continue, as a result of same. Respondent calls upon Complaining and Charging Parties to prove the allegations denied in this Second Amended Answer to the Complaint Charge in accord with the applicable Burdens of Proof.

8. Respondent denies all of the allegations in paragraph 8. By way of further answer, Respondent incorporates and restates its further Answer set forth above in paragraph 7, and fully incorporates the same in this Answer to the Allegations of Paragraph 8.

9. Respondent denies all of the allegations in Paragraph 9. By way of further answer, Respondent incorporates and restates its further Answer set forth above in paragraphs 7 and 8, and fully incorporates the same in this Answer to the Allegations of Paragraph 9.

10. Respondent denies all of the allegations in Paragraph 10 that it interfered with, restrained, or coerced any employees in the exercise of any of their rights guaranteed by law, or otherwise.

11. Respondent has insufficient, including and specifically legal knowledge, to specifically admit or deny these portions of the allegations in Paragraph 10, and on that basis, therefore,

denies same.

May 6, 2022

RELIANT JANITORIAL SERVICES, LLC

/s/ Thomas C. LaPorte

Thomas C. LaPorte, Esquire

BBO: 634194

LaPorte Law Group. PLLC

P.O. Box 390

573 Pine Street

Manchester, NH 03104

Tel No.: 603-303-9520

Email: [laporelawgroup@gmail.com](mailto:laporelawgroup@gmail.com)

CERTIFICATE OF SERVICE

I, Thomas C. LaPorte, do hereby certify that I have served copies, pursuant to NLRB Rule 102.21, of the foregoing Answer to Amended Charge, via the electronic filing system, and by separate electronic mail upon the following:

(b) (6), (b) (7)(C)

Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890

Miriam Hasbun, Esq.  
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National Labor Relations Board  
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Pablo Carrasco, Staff Attorney  
Justice at Work, Inc.  
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Boston, MA 02111  
[pcarrasco@jatwork.org](mailto:pcarrasco@jatwork.org)

Date: May 3, 2022

/s/Thomas C. LaPorte

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 01**

**RELIANT JANITORIAL SERVICES, LLC**

**and**

**(b) (6), (b) (7)(C), an Individual**

**Case 01-CA-279573**

**ORDER APPROVING CONDITIONAL WITHDRAWAL REQUEST,  
DISMISSING COMPLAINT, AND WITHDRAWING NOTICE OF HEARING**

A Complaint and Notice of Hearing issued in the above-captioned matter on February 8, 2022. Thereafter, the Charging Party requested withdrawal of the charge based upon a private agreement between the parties. Having duly considered the request for withdrawal,

IT IS ORDERED that the request to withdraw the charge is approved, conditioned on the performance of the undertakings in the private agreement between the parties. The charge is subject to reinstatement for further processing if the Charging Party requests reinstatement and supports its request with evidence of non-compliance with the undertakings in the private agreement.

IT IS FURTHER ORDERED that the Complaint is dismissed, and the Notice of Hearing is withdrawn.

Dated: July 12, 2022

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Laura A. Sacks, Regional Director  
National Labor Relations Board  
Region 01



**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 01**

**RELIANT JANITORIAL SERVICES, LLC**

**and**

**(b) (6), (b) (7)(C), an Individual**

**Case 01-CA-279573**

**AFFIDAVIT OF SERVICE OF: ORDER APPROVING CONDITIONAL WITHDRAWAL  
REQUEST, DISMISSING COMPLAINT, AND  
WITHDRAWING NOTICE OF HEARING**

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on **July 12, 2022**, I served the above-entitled document(s) by **electronic mail** upon the following persons, addressed to them at the following addresses:

**(b) (6), (b) (7)(C)**  
Reliant Janitorial Services, LLC  
Nine Lowell Avenue  
Winchester, MA 01890

Thomas C. LaPorte, Esq.  
LaPorte Law Group, PLLC  
573 Pine Street  
P.O. Box 590  
Manchester, NH 01304

**(b) (6), (b) (7)(C)**

Pablo Carrasco, Staff Attorney  
Justice at Work, Inc.  
33 Harrison Ave., Suite 501  
Boston, MA 02111

July 12, 2022

Date

Elizabeth C. Person, Designated Agent of NLRB

Name

*Elizabeth C. Person*

Signature